

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

STEPHANIE BARNETT,	:	Case No. 1:16-cv-469
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
SARAH RONAN-BENTLE, M.D., et	:	
al.	:	
	:	
Defendants.	:	

NOTICE OF REMOVAL

1. Under 28 U.S.C. § 1442, Defendant Michael C. Petro, M.D. is removing to this Court a civil action originally filed in the Court of Common Pleas of Hamilton County, Ohio.

2. On March 7, 2016, Plaintiff Stephanie Barnett filed a document titled “Complaint with Jury Demand Endorsed Hereon” in the Hamilton County Court of Common Pleas. A copy of the complaint is attached as Exhibit A. Defendant Michael C. Petro, M.D. was served notice of the Summons on March 17, 2016.

3. This action is removable under 28 U.S.C. § 1442(a)(1). Defendant Michael C. Petro, M.D. is an employee and officer of the United States and was acting within the scope of his federal employment with regard to the allegations made in Plaintiff’s Complaint.

4. Because Defendant Michael C. Petro, M.D. received a copy of the complaint on March 17, 2016, he is removing this action within the 30-day timeframe established under 28 U.S.C. § 1446(b).

5. A copy of this Notice of Removal will be filed promptly with the Clerk of the Court of Common Pleas of Hamilton County, Ohio, which will effect the removal. *See* 28 U.S.C. § 1446(d).

Respectfully submitted,

BENJAMIN C. GLASSMAN
Acting United States Attorney

s/Matthew J. Horwitz
MATTHEW J. HORWITZ (0082381)
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CERTIFICATE OF SERVICE

I certify that on April 14, 2016, the foregoing was presented to the Clerk of the Court for filing and uploading into the CM/ECF system, and I certify that on the same date a copy of the foregoing was sent by first class mail to:

Donald C. LeRoy, Esq.
9435 Waterstone Boulevard, Suite 140
Cincinnati, OH 45249

Mark A. MacDonald, Esq.
Jade A. Stewart, Esq.
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s/Matthew J. Horwitz
MATTHEW J. HORWITZ (0082381)
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